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INFO RUEHC/SECSTATE WASHDC 2723
RHMFIUU/HQ BICE WASHINGTON DC
RUEHGP/AMEMBASSY SINGAPORE 3639

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SIPDIS

USDOC FOR 532/OEA/MNICKSON-DORSEY/LLAUCIUS
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS
SINGAPORE FOR FCS

SIPDIS

E.O. 12958: N/A

TAGS: [BMGT](#) [BEXP](#) [ETRD](#) [ETTC](#) [HK](#)
SUBJECT: EXTRANCHECK: POST SHIPMENT VERIFICATION: PEMSTAR SINGAPORE
PTE LTD

REF: A) USDOC 03972 B) D353774

1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Regional Export Control Officer Philip Ankel (ECO) conducted a post shipment-verification (PSV) at Benchmark Electronics Manufacturing Singapore Pte. Ltd., 2 Woodlands Sector 1, NO. 01-21, Woodlands Spectrum, Singapore (Benchmark). This company is the successor to the former Pemstar Singapore Pte. Ltd. referenced in reftel A. The item in question is a single channel noncontact measuring system exported on or about May 30, 2006 and valued at USD 3,714. The item is classified under Export Control Classification Number (ECCN) 2B006 and controlled for national security (NS) and nuclear nonproliferation (NP) reasons. The exporter was Lion Precision of St. Paul, Minnesota.

¶3. According to the Singapore companies registry, Benchmark has been in existence since 1998 (although its name was changed to Benchmark Electronics Manufacturing Singapore Pte. Ltd. as of March 23, 2007). Its paid-up share capital is the Singapore equivalent of USD 600,000. U.S. nationals Cary Tze Fu and Gayla Joyce Delly as well as Singapore nationals, Ong Teik Lin and Lun Chee Leong are listed as directors. The sole shareholder is listed as Benchmark Electronics Manufacturing, Inc. of Rochester, Minnesota.

¶4. On June 20, 2007, the ECO visited the company and met with Mr. Poh Cheng Chuan, Materials Director and Mr. Eric Ee, Senior Engineer, Mechanical. Mr. Poh Cheng Chuan stated that the company designs and manufactures semiconductor equipment including data storage equipment. Its customers include Sun Micro.

¶5. Mr. Poh Cheng Chuan showed the ECO the applicable item (with serial number 0602 7601). He stated that it is being used for measuring the motion of air bearing spindles as part of the company's design of multi-disk writers. Mr. Poh Cheng Chuan stated that Benchmark's supplier, Scigate Automation Pte, had not informed Benchmark of the applicable license conditions. He further stated that Scigate is not a regular supplier for Benchmark. ECO provided Benchmark with the applicable license conditions as well as additional information on U.S. export/reexport controls.

¶6. At the time visited, Benchmark appeared to be a suitable recipient of the commodities shipped since Benchmark cooperated with the PSV, provided ECO with access to the item and operates a line of business consistent with the item's use. However, in light of the fact that Benchmark had not been informed of the applicable license conditions as required by BIS license D353774, the ECO recommends

that this PSV be classified as Unfavorable.